

May 14, 2007

Dr. Barbara Shane  
Executive Secretary for the NTP Board  
NTP Liason and Scientific Review Office  
National Institute Environmental Health Sciences  
PO BOX 12233, MD A3-01  
Research Triangle Park, NC 27709

Via electronic mail to: [shane@niehs.nih.gov](mailto:shane@niehs.nih.gov)

Re: EWG comments on Toxicology and carcinogenesis Studies of Sodium Dichromate Dihydrate (CAS No. 7789-12-0) in F344/N Rats and B6C3F1 Mice (Drinking Water Studies).

Dear Dr. Shane:

Environmental Working Group (EWG), a not-for-profit environmental research and advocacy organization based in Washington DC, is grateful for the opportunity to comment on the National Toxicology Program's (NTP) important study on the carcinogenic hazards of hexavalent chromium compounds.

Although we regret having to submit these comments so close to the date of the meeting where the study's draft findings will be reviewed, EWG felt it was important for the NTP panel members to be informed of the affiliations of the individuals who have critiqued the draft report. Specifically, EWG would like point out that of the five sets of comments that have been submitted to the NTP panel as of this date, four of them have been written by individuals with direct and extensive financial ties to the chromium industry: Michael Gargas, Silvio De Flora, Brent Kerger, Dennis Paustenbach, and Deborah Proctor.

While there is nothing inherently wrong with having such industry connections, EWG requests that panel members keep these ties in mind when reflecting on written or oral public comments provided by these individuals.

Notably, De Flora, Kerger, Paustenbach and Proctor were all specifically mentioned in a recent peer-reviewed journal article ("Corporate Corruption of Science - The Case of Chromium (VI)," published in the International Journal of Occupational and Environmental Health) describing how the chromium industry has succeeded in influencing public health policy regarding hexavalent chromium by employing scientists-for-hire. [1] Paustenbach and Proctor were also cited in a second article on this same topic: "Selected science: an industry campaign to undermine an OSHA hexavalent chromium standard," published in Environmental Health. [2] Gargas, while not mentioned specifically in either of these articles, has worked for several chromium polluters through his previous job with Paustenbach's firm ChemRisk and his current position with the Sapphire Group. [3]

Due to space considerations, EWG will not detail the ethically dubious activities of the above individuals here, but rather refer the panel to the attached copies (and supplementary documents) of these two articles.

Although some of the individuals we mention here do in fact acknowledge their connection to the chromium industry in their comments submitted to NTP, none have been forthcoming about the extent of these financial ties. More importantly, none have been forthcoming about how they have been part of the industry's efforts to undermine public health standards for hexavalent chromium.

Thank you for considering these concerns.

Sincerely,

Richard Wiles  
Executive Director  
Environmental Working Group

References cited:

[1] Egilman, D. 2006. Corporate Corruption of Science - The Case of Chromium (VI). *International Journal of Occupational and Environmental Health* 12(2): 169-176.

[2] Michaels, D., C. Monforton and P. Lurie. 2006. Selected science: an industry campaign to undermine an OSHA hexavalent chromium standard. *Environmental Health: A Global Access Science Source* 2006, 5:5

[3] Toxicology Excellence for Risk Assessment. 1998. ITER Peer Review on Hexavalent Chromium Meeting Summary. Available at:  
<http://www.tera.org/peer/HexavalentChromium1998MeetingReport.pdf>